



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

June 24, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Golden Bank, National Association
Charter Number: 18558

9315 Bellaire Boulevard
Houston, TX 77036-0000

Office of the Comptroller of the Currency

Houston Field Office
1301 McKinney Street, Suite 1410
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

Golden Bank, National Association (Golden) has an outstanding record of meeting community credit needs based on the following:

- The geographic distribution of loans to businesses shows excellent dispersion and significantly exceeds the characteristics of the assessment area in low- and moderate-income census tracts.
- The level of community development lending shows excellent responsiveness. Officers have originated a significant level of qualified loans.
- A substantial majority of loans were originated in the assessment area.
- The bank's quarterly loan-to-deposit ratio since the prior examination exceeds a peer group of banks in the assessment area.

Scope of Examination

We completed a full-scope review of the bank's CRA activities in the two assessment areas of Houston and Dallas. The Lending Test included a review of all commercial loans to businesses originated in the assessment area for 2005, 2006, and 2007. This was a total of 362 loans. We reviewed borrower and geographic distribution. For residential real estate lending, our review was limited to geographic distribution. Officers do not originate a significant number of loans to individuals for primary residences. Of the 23 loans originated during the evaluation period, only two loans were for primary residences. All other residential loans originated were for residential rental properties, mostly multifamily apartments. Although a full array of loan products are offered, the bank does not have any other significant loan products. The Community Development Test included a review of community development loans, investments and services since the prior CRA examination.

Prior to this examination, in May 2008, we completed a Data Integrity review for information maintained by management of originated loans. During our review, we found revenue reporting for loans to businesses had an error rate exceeding 5 percent, and we did not consider the data reliable as a result of this error rate. As an Intermediate Small Bank, management is not required to collect and report information on business lending. However, management elected to review and correct all lending information to ensure that it was correct for the CRA examination. We tested management's information after the correction at this CRA examination and found it was reliable. Therefore, our examination is based on all loan originations during the period and not a sample.

Description of Institution

Golden is a full-service community bank headquartered in Houston, Texas at 9315 Bellaire Boulevard. It has a total of five locations. Two are in Houston in Harris County, Texas. One is in Sugar Land in Fort Bend County, Texas. One is in Richardson in Dallas County, Texas. The other is in Plano in Collin County, Texas. Golden was formerly Texas First National Bank. The name was changed to Golden Bank, National Association on December 7, 2006. The bank primarily serves the Asian community.

As of June 30, 2008, Golden had assets of \$457 million and a Tier One Leverage Capital Ratio of 13 percent. There are no legal or financial factors that impede the bank's ability to help meet the credit needs of the assessment area. The bank received a Satisfactory rating at the prior examination dated May 23, 2005.

Please refer to Golden's CRA Public File for more information about this institution.

Description of Assessment Areas (AAs)

Golden has two AAs in Texas. One is a portion of the Houston-Sugar Land-Baytown Metropolitan Statistical Area (MSA). It is known as the Houston AA. The other is a portion of the Dallas-Plano-Irving Metropolitan Division, a unit within the larger Dallas-Fort Worth-Arlington MSA. It is known as the Dallas AA. Both AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income census tracts (CTs).

Community contacts in the Houston AA have identified the need for mortgage financing for individuals at or below 80 percent of the median income, mortgage loans for persons with low credit scores, and mortgage counseling on specifically how and what documents are needed to complete a mortgage application. In addition to mortgage loans, contacts have identified the needs for small loans to businesses and loans to individuals to construct new homes. Owner-occupied residential real estate lending is not a primary product. Commercial lending is a primary product though, and Golden officers originate a large volume of loans to small businesses.

HOUSTON AA

The AA includes 746 census tracts (CTs) in four counties. It includes all of the 642 census tracts (CTs) of Harris County, all 58 CTs of Fort Bend County, 27 CTs in west Montgomery County, and 12 CTs in north Brazoria County. All CTs are contiguous. Approximately 39 percent or 291 CTs of the total are designated as low- or moderate-income. The updated median family income for 2007 is \$57,300. The Houston-Sugar Land-Baytown MSA is a ten county metropolitan area located in the Gulf Coast region of Southeast Texas. The MSA is the sixth largest in the nation with a population of 5.6 million as of the 2007 U.S. Census estimate. The population is centered in Houston, Texas. It is the largest economic and cultural center in Texas with a population estimated at 2.2 million.

Harris County

All of Harris County, Texas is designated as part of Golden's Houston AA. There are 63 CTs (10%) designated as low-income and 223 CTs (35%) designated as moderate-income. Middle-income CTs in the AA total 178 (27%), upper-income CTs total 178 (27%), and seven CTs do not have a designation (1%). Harris County is the largest county in Texas and the third largest in the nation. The population is estimated at 3.9 million according to a 2007 U.S. Census Bureau estimate with a growth rate since the 2000 Census of 15 percent. It is the third most populous county in the United States. The 2006 U.S. Census Bureau shows an unemployment rate of 7.5 percent and 16 percent of the population lives below the poverty level. The median family income in 2006 was \$53,779. The county seat is Houston which is the largest city in Texas and the fourth largest city in the nation.

Houston has the largest medical center in the world, the Texas Medical Center. The Center's economic impact exceeds \$10 billion annually, and it has approximately 61 thousand employees. Also, Houston is second only to New York City in Fortune 500 company headquarters, and more than 5 thousand energy-related firms are located in the city. Major employers include Continental Airlines, Administaff, Halliburton, Wal-Mart Stores, Exxon Mobil, Kroger Company, Memorial Hermann Healthcare System, and The University of Texas Medical Branch, all with more than 13 thousand employees each.

Banking competition is intense. The five largest competitors in the county include: JP Morgan Chase Bank, National Association (N.A.), Bank of America, N.A., Wells Fargo Bank, N.A., Amegy Bank, N.A., and Washington Mutual Bank, Federal Savings Bank.

Fort Bend County

All of Fort Bend County, Texas has been designated as part of the AA. The county has only one low-income CT (2%), four moderate-income CTs (7%), 21 middle-income CTs (36%), and 32 upper-income CTs (55%). It is one of the fastest growing counties in the United States. The county had a population of 510 thousand as of the 2007 U.S. Census Bureau estimate with a growth rate since the 2000 Census of 44 percent. Part of Houston is in Fort Bend County. The unemployment rate is 7 percent, and 7.5 percent of the population lives below the poverty level. Major employers include the Fort Bend Independent School District with more than 8 thousand employees and Fluor Corporation with approximately 3 thousand employees. Sugar Land has the second largest level of economic activity after Houston, and it is the third largest city in the MSA. Sugar Land has the most important and fastest growing economic center in Fort Bend County. It is the headquarters for Western Airways. Engineering firms and related industries are an economic engine for Sugar Land and the county.

Banking competition is intense. Major competitors in the area include: Capital One, N.A., Wells Fargo Bank, N.A., JP Morgan Chase Bank, N.A., Citibank, N.A., and GE Capital Financial, Inc.

Montgomery County

Management designated the 274 CTs in western Montgomery County, Texas as part of the AA. Of the 24 CTs, nine CTs are middle-income (33%), 17 are upper-income CTs (63%), and one CT does not have a designation (4%). The county covers over 1 thousand square miles and is the fifteenth largest county in Texas. The AA includes the communities of Conroe, Montgomery, Magnolia, The Woodlands, and Shenandoah. Conroe and The Woodlands are the largest and have the greatest potential for loan and deposit growth. In 2000, Montgomery County had an estimated population of 294 thousand. In 2007, the U.S. Census Bureau estimated the population to be 413 thousand, a 40 percent growth rate in seven years. The population is projected to grow to 480 thousand by 2012. The unemployment rate is 6.1 percent and 12 percent of the population lives below the poverty level. The updated median family income in 2006 was \$69,972.

Conroe is the county seat, and it is 45 miles north of downtown Houston. The Greater Conroe Economic Development Council estimated in 2007 that Conroe had a population of more than 45 thousand. Conroe's economy has greatly diversified in the last twenty years with growth in manufacturing, retail, health care, biotechnology, construction, and tourism. Employment opportunities are mostly centered in the trade and service sectors.

The Woodlands is a master-planned community located 25 miles north of downtown Houston along Interstate 45. A *2006 American Community Survey* by the U.S. Census Bureau estimated the population at 64 thousand, which represents a 16% growth rate from the 2000 Census. Although it has been mostly a suburban development, it is also home to several large corporations. These include Chevron Phillips, Anadarko Petroleum Corporation, Baker Hughes, CB&I, and Hewitt Associates. The Woodlands has a large shopping mall, seven golf courses, and a regional concert facility, The Cynthia Woods Mitchell Pavilion. It also has a four star hotel, The Woodlands Resort.

Financial services competition in Montgomery County and particularly in The Woodlands is intense. There are numerous branches of large multi-state national and regional financial institutions as well as local community banks competing for the business market. Also, Conroe has a large and competitive credit union.

Brazoria County

The northern part of Brazoria County, Texas has been designated as part of the AA. Of the 12 CTs, six CTs are middle-income (50%) and six are upper-income CTs (50%). In 2000, Brazoria County had an estimated population of 242 thousand. In 2007, the U.S. Census Bureau estimated the population to be 413 thousand, a 40 percent growth rate in seven years. The county seat is Angleton with 19 thousand residents, and its largest

city is Pearland with an estimated population of 80 thousand. Pearland is the fastest growing city south of Houston, and it is adjacent to Houston. Retail, housing, and commercial growth in Pearland is attributed to several master planned communities. There is vast commercial development including two new emergency care hospitals. The largest employers in Pearland include: Pearland Independent School District, Wal-Mart, City of Pearland, Kemlon, Weatherford, TurboCare, Super Target, Lowes, Davis-Lynch, and Packaging Service Company. The unemployment rate for Pearland was 3.6 percent and 6.6 percent of the population lives below the poverty level.

Banking competition in Brazoria County is intense. The major competitors include: Bank of America, N.A., Guaranty Bank, Wells Fargo Bank, N.A., and Texas Gulf Bank, N.A., as well as several small community banks and credit unions.

DALLAS AA

The AA includes 544 CTs in two counties. It includes all of the 487 CTs in Dallas County and 57 CTs in Collin County. All CTs are contiguous. Approximately 43 percent or 236 CTs of the total are designated as low- or moderate-income. The updated MSA median family income for 2007 is \$63,200. The Dallas-Plano-Irving Metropolitan Division (MD) is an 8-county MD. It is the eastern portion of the larger Dallas-Fort Worth-Arlington MSA, which is the fourth largest MSA in the nation with a population of 6.1 million as of the 2007 U.S. Census estimate.

DFW International Airport is halfway between Dallas and Fort Worth located partially in Irving in Dallas County. It plays a major role in the Dallas-Plano-Irving economy. A 2007 Wilbur Smith Associates economic impact assessment for the Texas Department of Transportation concluded that the DFW Airport economic impact exceeds \$16.6 billion and supports more than 300 thousand jobs. According to the Greater Dallas Chamber of Commerce, the ten largest employers in the Dallas-Irving-Plano MD are Wal-Mart, Dallas Independent School District, Baylor Health Care System, SBC Communications, Verizon Communications, City of Dallas, Texas Instruments, HCA Healthcare, Brinker International Inc., and the University of Texas Southwestern Medical Center.

Dallas County

All of Dallas County, Texas has been designated as part of the AA. It has 60 low-income CTs (12%), 174 moderate-income CTs (36%), and 141 middle-income CTs (29%). Upper-income CTs total 108 (22%), and four CTs do not have a designation (1%). Dallas County is the ninth most populous county in the United States. The county had a population of 2.4 million according to the 2007 U.S. Census Bureau estimate. Its county seat is Dallas, which is the largest city in the county. Dallas is the second largest city in Texas and the ninth-largest city in the United States.

The Dallas County economy is primarily based on petroleum, telecommunications, computer technology, banking, and transportation. Love Field Airport, close to downtown Dallas, serves many domestic passengers and is the home of Southwest Airlines. Information from the 2006 U.S. Census Bureau shows an unemployment rate of 7.1 percent, and 16.5 percent of the population lives below the poverty level. The updated median family income in 2006 was \$49,777.

Banking competition is intense. The six largest competitors in the county include: JP Morgan Chase Bank, N.A., Bank of America, N.A., Wells Fargo Bank, N.A., Comerica Bank, and Washington Mutual Bank.

Collin County

The southern portion of Collin County, Texas has been designated as part of the AA. Of the 57 CTs, there are no low-income CTs, two CTs are moderate-income (3%), and nine are middle-income CTs (16%). Upper-income CTs total 46 (81%). In 2000, Collin County had a population of 492 thousand. In 2007, the U.S. Census Bureau estimated the population to be 731 thousand, a 49 percent growth rate in seven years. The unemployment rate is 4.5 percent and 6.2 percent of the population lives below the poverty level. The U.S. Census Bureau reported in 2000 that Collin County is the wealthiest county in Texas for per capita income. As of 2006, the median family income was estimated to be \$88 thousand.

The county seat is McKinney with 107 thousand residents, and its largest city is Plano with an estimated population of 255 thousand. As of the 2000 census, Plano is the ninth largest city in Texas. Recently, Plano has drawn retail businesses to the area with the opening of The Shops at Legacy. It features apartments and numerous shops and restaurants and is known as an upscale area. In addition, Wal-Mart considered the city's affluence when it established the experimental luxury Wal-Mart Supercenter on Park Road and the Dallas North Tollway. Plano is home to many corporate headquarters including Ericsson Inc, Rent-A-Center, Crossmark, Perot Systems, Electronic Data Systems, JCPenney, Frito-Lay, Cinemark Theatres, and UGS. Plano also has many semiconductor and telecommunications companies in its Research and Technology District due to its proximity to Dallas' Telecom Corridor.

Conclusions with Respect to Performance Tests

LENDING TEST

The Lending Test is rated Outstanding. More weight was assigned to lending in the Houston AA. The Houston AA has 82 percent of the loans and 87 percent of the deposits. The Dallas AA has 18 percent of loans and 13 percent of the deposits.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is more than reasonable, and it exceeds a ratio of peer group banks. The quarterly ratio since the prior examination is 79.65 percent. A peer group of banks with less than \$1 billion in assets in the same AAs had a loan-to-deposit ratio of 76.60 percent for the same time period.

Lending in Assessment Area

A substantial majority of lending is inside the AA. The bank's performance is shown in the following table:

Table 1 - Lending in Houston AA and Dallas AA										
Loan Type	Number of Loans					Dollars of Loans (000)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Commercial	362	92.82	28	7.18	390	101,270	90.42	10,724	9.58	111,994
Residential Real Estate	23	76.67	7	23.33	30	22,643	71.03	9,233	28.97	31,876
Totals	385	91.67	35	8.33	420	123,913	86.13	19,957	13.87	143,870

Source: Data reported under Home Mortgage Disclosure Act (HMDA); data collected by bank.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

We did not analyze lending to borrowers of different incomes since consumer lending and owner-occupied residential lending is not a significant loan product.

Lending to businesses of different sizes in the Houston AA reflects reasonable penetration and meets the standards for satisfactory performance. The percentage of loan originations to small businesses with revenues of \$1 million or less by number and dollar is less than the characteristics of the AA. Golden has a mature customer base. Also, loans are frequently originated to assisted living centers, buffet restaurants, and strip shopping centers. These businesses traditionally have revenues more than \$1 million. In particular, the strip shopping centers provide rental space for small tenants who are not always borrowers of the bank. The bank's performance is shown in the following table:

Table 2A – Borrower Distribution of Loans to Businesses in Houston AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	67.53	5.60	26.87	100%
% of Bank Loans in AA by #	49.82	17.67	32.51	100%
% of Bank Loans in AA by \$	47.04	25.93	27.03	100%

Source: Dunn and Bradstreet data; data collected by bank

Similar to the Houston AA, lending to businesses of different sizes in the Dallas AA shows reasonable penetration and meets the standards for satisfactory performance. The percentage of loan originations to small businesses with revenues of \$1 million or less by number and dollar is less than the characteristics of the AA. The reasons are similar to the Houston AA. The bank’s location in far north Dallas County and Plano in Collin County is also a contributing factor. As described earlier, Collin County is the wealthiest county in Texas for per capita income. The bank’s performance is shown in the following table:

Table 2B – Borrower Distribution of Loans to Businesses in Dallas AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	65.98	5.95	28.07	100%
% of Bank Loans in AA by #	41.77	40.51	17.72	100%
% of Bank Loans in AA by \$	40.67	44.13	15.20	100%

Source: Dunn and Bradstreet data.

Geographic Distribution of Loans

The geographic distribution of loans to businesses in the Houston AA shows excellent dispersion. It exceeds the characteristics of the AA for loan originations in low-income CTs, and it significantly exceeds the characteristics in moderate-income CTs. The bank’s performance is shown in the following table:

Table 3A - Geographic Distribution of Loans to Businesses in Houston AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial *	5.21	8.13	24.17	35.34	26.40	22.97	43.63	33.56

Source: Dunn and Bradstreet data; data collected by bank.

* 0.59% of the businesses are in NA census tracts.

As with the Houston AA, the geographic distribution of loans to businesses in the Dallas AA shows excellent dispersion. It exceeds the characteristics of the AA for loan originations in low-income CTs, and it significantly exceeds the characteristics in moderate-income CTs. The bank’s performance is shown in the following table:

Table 3B - Geographic Distribution of Loans to Businesses in Dallas AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial*	5.42	7.59	28.41	58.23	30.32	18.99	34.58	15.19

Source: Dunn and Bradstreet data; data collected by bank.

* 1.27% of the businesses are in NA census tracts.

In addition to the geographic distribution of loans to businesses, we analyzed the distribution of non-owner occupied residential real estate loans, mostly apartment complexes. Of the total, three or 13 percent were in low-income CTs, 11 or 48 percent were in moderate-income CTs, and 5 or 22 percent were in middle-income CTs. Only 4 or 17 percent were in upper-income CTs. Therefore, over half of the residential real estate loans were originated in low- and moderate-income CTs.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

Overall, the bank’s performance for the Community Development Test is Outstanding and reflects excellent responsiveness to the needs of the AA primarily because of community development lending. Community development lending is concentrated in assisted living centers and affordable housing. The level of investments is satisfactory and consists of two continuing investments and several qualifying donations. The level of services supports the overall Outstanding rating.

Number and Amount of Community Development Loans

Officers originated a significant level of community development loans. The total number originated was 17 with a total dollar amount of \$17.3 million. In addition, one qualified loan was renewed in 2007 at \$4.6 million. We concluded based on the level of community development loans in the AA that Golden is meeting the needs of its AA. Therefore, we concluded loans in the greater regional area of Texas could also be considered in the Community Development Test as discussed in the CRA regulation.

Officers originated five loans for a total of \$8.9 million for assisted living facilities that serve low- and moderate-income persons. Most of the residents have incomes below the threshold of \$28,358 per year set by the Texas Department of Aging and Disability Services to qualify for Medicaid. Four loans are in the greater Texas regional area and one loan is in the Houston AA.

Officers originated a total of 12 loans for \$17.3 million and renewed one loan in the amount of \$4.6 million for affordable housing multifamily apartments. Four loans were originated in the Houston AA for a total of \$9.2 million. In the Dallas AA, four loans were originated for a total of \$729 thousand. In the greater Texas regional area, areas affected by Hurricanes Katrina and Rita, officers originated two loans for a total of \$3.7 million. The renewed loan for \$4.6 million was in the greater Texas regional area. Most of the properties were in either low- or moderate-income CTs, and all of the properties had rents below the average rental rates charged in the local areas.

Number and Amount of Qualified Investments

The bank has a continuing investment total of \$2 million. At the prior CRA examination, the bank had an equity investment of \$1.5 million in the CRA Qualified Investment Fund. In the fourth quarter 2004, the board approved the purchase of a second \$500 thousand investment in a mortgage pool from Access Capital Strategies Community Investment Fund, Inc. At this examination, the bank has the continuing \$1.5 million investment in the CRA Qualified Investment Fund of Community Capital Management. The investment is in Fannie Mae Pools in several states. The bank's allocation of the total pool is for properties in Harris County. Periodically, Community Capital Management will adjust the bank's allocation to the AA.

Similarly, the board and senior management continued to maintain the investment with Access Capital in the Access Capital Strategies Community Reinvestment Fund. The most recent activity report as of May 31, 2008 has the bank's balance at \$484 thousand and 52 shares. The fund's investment objective is to invest in geographically specific private placement debt securities in areas designated by management. The fund invests specifically in securities designed to support underlying community development activities targeted to low- and moderate-income individuals and small business.

Qualified contributions and donations total 37 with a dollar total of \$29 thousand. The amount specifically related to Katrina disaster relief was \$15 thousand.

Extent to Which the Bank Provides Community Development Services

The bank has a satisfactory level of community development services. Bank officers are active in several organizations that provide services for low- and moderate-income persons. In addition, officers provide many financial education opportunities for the community. During the evaluation period, officers conducted business seminars on trade finance, restaurant ownership, and letters of credit procedures. Officers also conducted a seminar for new immigrants on basic banking education and taught financial education classes to students at local universities.

The bank provided extensive hours of service to help evacuees from Hurricane Katrina in the latter part of 2005. This included such activities as distributing blankets and providing information from the Federal Emergency Management Agency (FEMA) and the American Red Cross. The bank donated supplies to organizations in the area to assist in meeting the basic needs of evacuees. Employees delivered clothes and

personal supplies regularly. Golden also revised guidelines for opening accounts and procedures for cashing government checks to accommodate the evacuee's banking needs. Several of the employees assisted the Katrina survivors in enrolling their children in Houston area schools.

Many of the officers and employees serve in community development qualifying charities and organizations. The more noteworthy are:

- Northwest Assistance Ministries (NAM) – Many of the bank's employees volunteer for this organization. Golden has also supported this organization through annual donations. According to the NAM website, NAM has assisted more than 103 thousand area residents in need during its last fiscal year. Many NAM clients need more than one NAM service or program. Approximately 90 cents of every dollar donated last year went toward helping people in need. Of the people NAM assisted, 55 percent were children and senior citizens.

The Assistance Program served an average of 880 people each month with emergency assistance such as shelter, clothing, transportation, prescriptions, and medical referrals. The Back-to-School Project provided 2,400 children with school supplies and clothing. In November and December of 2006, the Holiday Project provided 1,968 families with the items necessary for a healthy holiday dinner and food for three to five days, as well as toys and other age-appropriate gifts for approximately 3,500 children.
- Chinese Community Center – Several of the officers and employees are involved with this organization. One officer serves on the volunteer board and is a chairperson on the finance committee. This organization provides many services targeted to low- or moderate-income families.
- Chinese American Relief Effort (CARE) – The bank co-sponsored the 2007 Fourth of July celebration. All proceeds from this activity were used to provide school supplies to low- and moderate-income children.
- North American Taiwanese Women Association - An officer serves on the Scholarship selection committee. This organization provides annual need-based scholarships to area high school students.
- American Red Cross - Several of the bank's employees are involved as volunteers. This organization provides assistance to survivors of natural disasters such as Hurricanes Katrina and Rita.
- Thanksgiving Houston Super Feast – Many of the employees participate in this annual event as bank representatives. This event provides a traditional Thanksgiving Dinner to the homeless and financially needy people of Houston.

- Senior Citizen activities in the AA – The bank and many of the employees assist Senior Citizens. One such event is the Chinese May Festival Dinner Party for Senior Citizens who are low- or moderate-income. Another event supported by the bank is the 2007 Spring Chinese Senior Birthday Celebration hosted by the Chinese Community Center.

Golden offers many traditional banking services. These include various checking and savings accounts, retirement accounts, consumer and commercial loans, safe deposit boxes, internet banking, Automated Teller Machine (ATM) cards, international banking, sales of various monetary instruments, and wire transfer services. ATMs are not available at any of the five branch locations; however, customers may use any *Pulse* and *Cirrus* network ATM at no charge. These ATM networks are available nationwide, and the free use of these facilities expands the accessibility of funds for bank customers far beyond the bank's AA. Drive-in facilities are available at two of the bank's five branches.

The bank offers two low-cost checking accounts. One is for business customers, offered to unincorporated customers, requiring a minimum deposit of \$100 with no monthly service charge fee. No transaction fee is charged for the first 50 items. Golden also offers an affordable personal checking account for consumers. This account has a \$50 minimum deposit to open and no monthly service charge. Transaction fees are not charged for the first 10 items. An ATM card is available with this account. Golden also offers savings accounts to minor children with a \$25 opening deposit. These accounts do not have a service charge or minimum balance requirement.

Golden has a reasonable branch distribution. Golden has one of five or 20 percent of its branches in a moderate-income CT.

Responsiveness to Community Development Needs

Golden has an outstanding level of responsiveness to community development needs. Officers have originated a significant level of qualified community development loans for assisted living facilities and affordable housing multifamily apartments. The level of investments and services further supports the significant level of community development loans.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.